

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

JUAN MARTINEZ, JOSE PIMENTAL, CARLOS
CONTRERAS, EFRAIN REYES and JOWANY
CASTILLO,

Plaintiffs,

Case No. 21-cv-
03613(GRB)(JMW)

- *against* -

FELIKS & SON STORAGE TANK CORP., FELIKS &
SON SERVICES, LLC AND FELIKS SWIERZEWSKI,

Defendants.

**NOTICE OF MOTION FOR DEFAULT JUDGMENT PURSUANT TO
FEDERAL RULE OF CIVIL PROCEDURE 55(b)(2)**

PLEASE TAKE NOTICE that, on a date and time to be determined by the Court, the undersigned, attorneys for plaintiffs shall move before the Honorable James M. Wicks, United States Magistrate Judge, at the United States District Court, Eastern District of New York, 100 Federal Plaza, Central Islip, NY 11717 for a default judgment against defendants Feliks & Son Storage Tank Corp. and Feliks & Son Services, LLC, pursuant to Federal Rule of Civil Procedure 55(b)(2). In support of this motion, Plaintiff submits the annexed Memorandum of Law in Support of Plaintiffs Motion for Default Judgment Pursuant to Federal Rule of Civil Procedure 55(b)(2), the Declaration of Steven J. Moser in support thereof, with exhibits thereto, the Declarations of Juan Martinez, Jose Pimentel, Carlos Contreras, Efrain Reyes and Jowany Castillo, and the Declaration of Translation of Shirley Navarro Losito.

Dated: Huntington, New York
May 20, 2022

Respectfully submitted,
MOSER LAW FIRM, P.C.



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